

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

ALTPASS LLC,

Plaintiff,

v.

**PANASONIC CORPORATION OF
NORTH AMERICA,**

Defendant.

Case No. 2:21-cv-00285

**UNOPPOSED MOTION TO STAY ALL DEADLINES AND
NOTICE OF SETTLEMENT**

Plaintiff Altpass LLC (“Plaintiff”) notifies the Court that Plaintiff and Defendant Panasonic Corporation of North America (“Defendant”) have reached an agreement in principle that will resolve all pending claims between the Parties. Defendant has not yet made an appearance in this case. Accordingly, Plaintiff moves for a thirty (30) day stay of all pending deadlines, including Defendant’s Answer Deadline of October 19, 2021 and the Scheduled Conference set for November 18, 2021, until November 29, 2021 so that the parties may submit dismissal papers accordingly. This stay is not sought for the purpose of delay but so that justice may be served.

DATED: October 29, 2021

Respectfully submitted,

By: /s/ Hao Ni
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*ATTORNEY FOR PLAINTIFF
ALTPASS LLC*

CERTIFICATE OF CONFERENCE

The undersigned counsel for Plaintiff certifies that he met and conferred with counsel for Defendant on October 28, 2021 and that Defendant's counsel agree with this motion.

/s/ Hao Ni
Hao Ni

CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of October, 2021, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Eastern District of Texas, Marshall Division, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Hao Ni
Hao Ni